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22 *iTALK GLOBAL COMMUNICATIONS, INC. dba iTALKBB*

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28 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
NORTHERN DIVISION

29 U2 HOME ENTERTAINMENT, INC., a California) Case No.: CV 10-05615 JSW
30 Corporation doing business as CENTURY HOME)
31 ENTERTAINMENT and TAI SENG) **STIPULATION FOR ORDER TO**
32 ENTERTAINMENT,) **EXTEND TIME TO SUBMIT**
33 Plaintiff,) **SUPPLEMENTAL CMC STATEMENT**
34 vs.) **(INCLUDING PROPOSED TRIAL**
35) **SCHEDULE); ORDER [PROPOSED]**
36) **THEREON**
37)
38 HANYA STAR CULTURE & TECHNOLOGY) Complaint Filed: December 10, 2010
39 CO., LTD., a foreign corporation doing business in) First Amended Complaint Filed: March 11,
40 California, and doing business as HANYA STAR) 2011
41 COMPANY, INC.; iTALK GLOBAL)
42 COMMUNICATIONS, INC., a foreign corporation) Honorable Judge Jeffrey S. White, Presiding
43 doing business in California, and doing business as)
44 iTALKBB; and DOES 1 through 100, inclusive,) (E-filing)
45)
46 Defendants.)

1 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 6-1(b) of the Civil Local
2 Rules of the United States District Court, Northern District of California, Plaintiff U2 HOME
3 ENTERTAINMENT, INC., a California corporation, doing business as CENTURY HOME
4 ENTERTAINMENT and TAI SENG ENTERTAINMENT ("U2" or "Plaintiff"), on the one hand, and
5 Defendant iTALK GLOBAL COMMUNICATIONS, INC., doing business as iTALKBB ("Defendant"
6 or "iTalk"), on the other hand, hereby agree and stipulate as follows:

7 WHEREAS, a Case Management Conference was held in this matter on July 22, 2011, at 1:30
8 p.m. in Courtroom 11; and

9 WHEREAS, at the Case Management Conference the Honorable Judge Jeffrey S. White ordered
10 counsel for U2 and Defendant iTalk to submit a supplemental CMC Statement ("Supplemental CMC
11 Statement") setting forth a schedule for the pre-trial proceedings (to cover up to the hearing date for
12 dispositive motions) by no later than July 29, 2011; and

13 WHEREAS, all of the parties to this case, including Defendant HANYA STAR CULTURE &
14 TECHNOLOGY CO., LTD., a foreign corporation doing business in California, and doing business as
15 HANYA STAR COMPANY, INC., who has not yet been served, have been engaging in settlement
16 discussions and are very close to reaching a settlement of this matter;

17 WHEREAS, one or more parties have asked their counsel not to engage in additional work
18 pending the outcome of such settlement discussions; and

19 WHEREAS, in light of these events the parties believe it would serve judicial economy and
20 conserve resources if the time to submit the Supplemental CMC Statement be extended by thirty (30)
21 so that the parties can hopefully complete a settlement of this matter without incurring additional
22 attorneys' fees; and

23 WHEREAS, Rule 6-1(b) of the Civil Local Rules of the United States District Court, Northern
24 District of California, permits the parties to request an enlargement of time by stipulation in writing;
25 and

26 WHEREAS, Plaintiff and Defendant iTalk agree that the requested enlargement of time will
27 allow the parties adequate time to further discuss settlement and potentially reach a settlement of this
28 matter; and

1 WHEREAS, Plaintiff and Defendant iTalk agree that the date by which Plaintiff and iTalk shall
2 submit the Supplemental CMC Statement shall be no later than August 29, 2011, and;

3 NOW THEREFORE, Plaintiff and Defendant iTalk, by and through their respective
4 undersigned counsel, hereby stipulate that the time for the Plaintiff and Defendant iTalk to submit the
5 Supplemental CMC Statement that was ordered by the Court at the July 22, 2011 Case Management
6 Conference be extended up to and including August 29, 2011; and

7
8 SO STIPULATED.

9 IDELL & SEITEL LLP

10 Dated: July 29, 2011 By: /Richard J. Idell/
11 Richard J. Idell
12 *Attorneys for Plaintiff U2 HOME ENTERTAINMENT,
INC.*

13 Dated: July 29, 2011 BAKER & McKENZIE LLP

14 By: /Tod L. Gamlen/
15 Tod L. Gamlen
16 Attorneys for Defendant
17 *iTALK GLOBAL COMMUNICATIONS, INC. dba iTALK
BB*

18 **ATTESTATION OF CONCURRENCE**

19 I, Richard J. Idell, attest that I am one of the attorneys for Plaintiff U2 Home Entertainment,
20 Inc., and as the ECF user and filer of this document, I attest that, pursuant to General Order No.
21 45(X)(B), concurrence in the filing of this document has been obtained from Tod L. Gamlen, the above
22 signatory.

23
24 Dated: July 29, 2011 By: /Richard J. Idell/
25 Richard J. Idell

26 **[PROPOSED] ORDER**

27 **IT IS SO ORDERED.**

1 Dated: August 1, 2011

Jeffrey S. White

2 Hon. Jeffrey S. White
3 Judge of the United States District Court
4 Northern District of California
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